

December 5, 2025

**Via IZIS**

Anthony Hood, Chairperson  
District of Columbia Zoning Commission  
441 4th Street, NW, Suite 200 South  
Washington, DC 20001

Re: Zoning Commission Case No. 25-13 – Text and Map Amendments to Create New  
Wisconsin Avenue Mixed Use Zones

Dear Chairperson Hood:

Goulston & Storrs submits the following comments on behalf of 4800 Wisconsin Avenue, LLC (“**Owner**”), the owner of the property located at 4810 Wisconsin Avenue, NW (Lot 20, Square 1733, the “**Property**”). In general, Goulston & Storrs and the Owner are supportive of the goals and policies proposed in the zoning text and map amendments that create the Wisconsin Avenue Mixed Use Zones.

The Property is the only site that will be subject to the proposed Specific Design Requirements enumerated in the new Section 1008.1 of Subtitle G, which requires an east-west pedestrian corridor at Davenport Street, NW between Wisconsin Avenue, NW and 42<sup>nd</sup> Street, NW. This letter outlines the Owner’s concerns with this proposed section of the new MU-8A/WA zone.

The Office of Planning’s Hearing Report (pages 16 and 17) notes that the Wisconsin Avenue Development Framework (WADF) included building form and design guidelines that require a public pedestrian corridor of a maximum 25 feet wide on Square 1733, between Wisconsin Avenue, NW and 42<sup>nd</sup> Street, NW, for connectivity and breaking down building massing. Proposed Section 1008.1 requires that this public pedestrian corridor be aligned with Davenport Street, NW. While the WADF goals of connectivity and breaking down the massing of buildings in Square 1733 are laudable, the proposed Section 1008.1 is not likely to achieve those goals.

As depicted in the attached Zoning Diagram, there are numerous problems with requiring an east-west pedestrian corridor in Square 1733 that is aligned with Davenport Street, NW.

**Connectivity** - One of the biggest issues with the requirement to align the pedestrian corridor with Davenport Street, NW is the significant change in grade (14 feet) that exists from Wisconsin Avenue, NW down to 42<sup>nd</sup> Street, NW at Davenport Street, NW. This change in grade creates significant ADA accessibility issues for pedestrian connectivity, as the only realistic way to satisfy ADA requirements would be to introduce an exterior public elevator within the pedestrian corridor. In addition, Section 1008.1(a)(3) notes that the purpose of the pedestrian corridor requirement is to provide clear sightlines between the connecting streets. Due to the change in grade at this location the sightlines between the two streets are significantly obscured, especially from 42<sup>nd</sup> Street, NW looking towards Wisconsin Avenue, NW.

**Building Massing/Marketability of Residential Units** – The shape of the Property north of Davenport Street, NW comes to a sharp point as 42<sup>nd</sup> Street, NW meets Wisconsin Avenue, NW. This shape of the Property and the requirement that the pedestrian corridor be uncovered for at least 75% of its length drastically impacts the marketability of the residential units that can be created north of the pedestrian corridor. Providing the necessary hallway in this northern portion of the building will result in residential units that are only 15 feet deep, rather than 35 feet deep which is more typical for residential units.

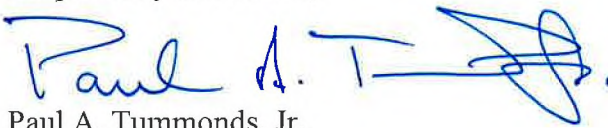
**Actual Use of the Corridor Area** - In addition, given the relatively short distance that exists between Davenport Street, NW and the intersection of 42<sup>nd</sup> Street, NW and Wisconsin Avenue, NW, it is questionable whether people will actually utilize the required pedestrian corridor, especially given the number of stairs that will be necessary to address the 14 feet of grade change. Also, the need for the stairs in the pedestrian corridor will also limit the potential areas that can be used for commercial frontage or outdoor seating that are contemplated in Section 1008.1(a)(5).

In addition to the concerns noted above, we would like to make the Zoning Commission and the Office of Planning aware of a few technical corrections that should be made to the proposed text and map amendments.

- A new Section 1008.1(b) in Subtitle G was added in the OP Hearing Report which states: “A pedestrian corridor provided in accordance with this section shall be considered as satisfying the public plaza requirement of Subtitle C, Chapter 17”. However, Section 1700.3 of Subtitle C notes that the Plaza regulations only apply to lots in the MU-10 or CG-4 zones. It appears that this new Section 1008.1(b) is not necessary.
- The proposed amendments to Subtitle W, Section 127.1 identify the lots and squares that will be part of the new MU-8A/WA Zone. Section 127.1(l) should also refer to the lots in Square 1733 that are currently zoned **MU-4**.

Please feel free to contact the undersigned if you have any questions or comments regarding the information provided in this letter.

Respectfully Submitted,

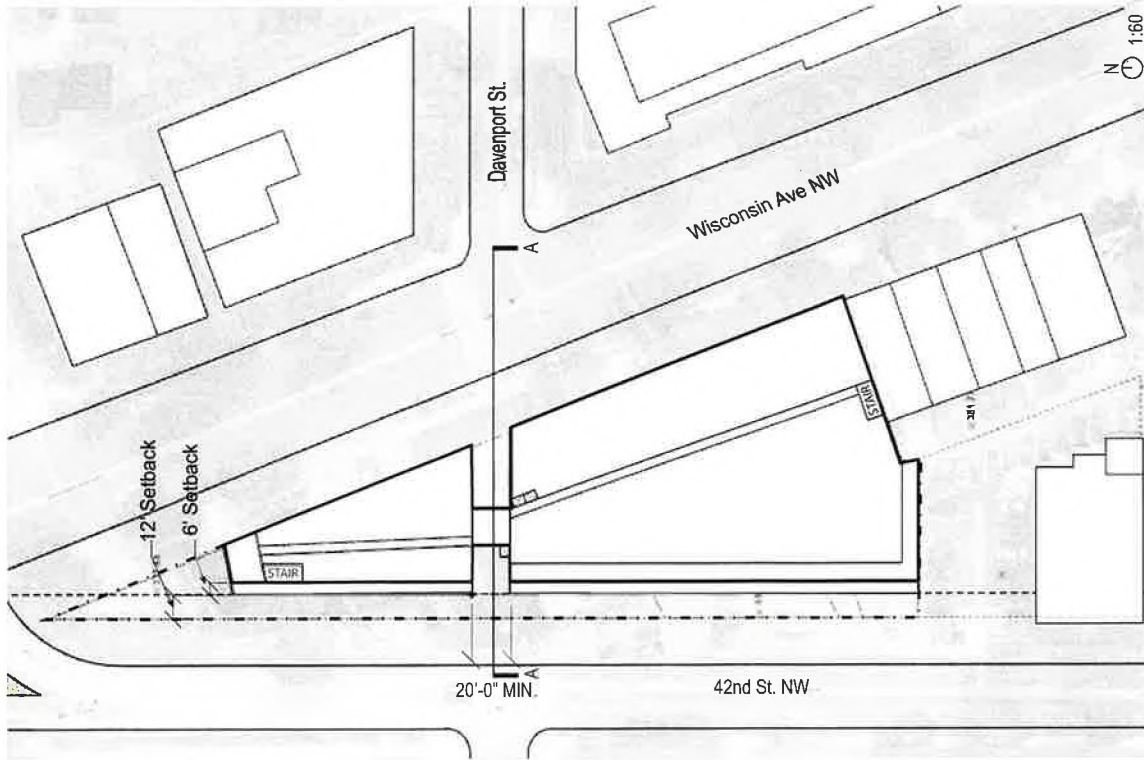
A handwritten signature in blue ink that reads "Paul A. T." followed by a stylized flourish.

Paul A. Tummonds, Jr.

Encl.

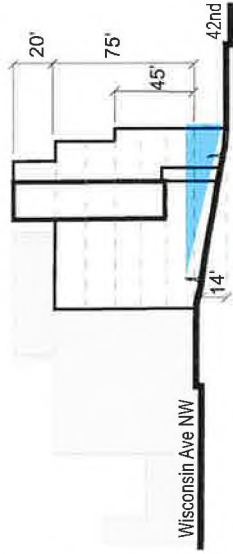
cc: Maxine Brown-Roberts, OP





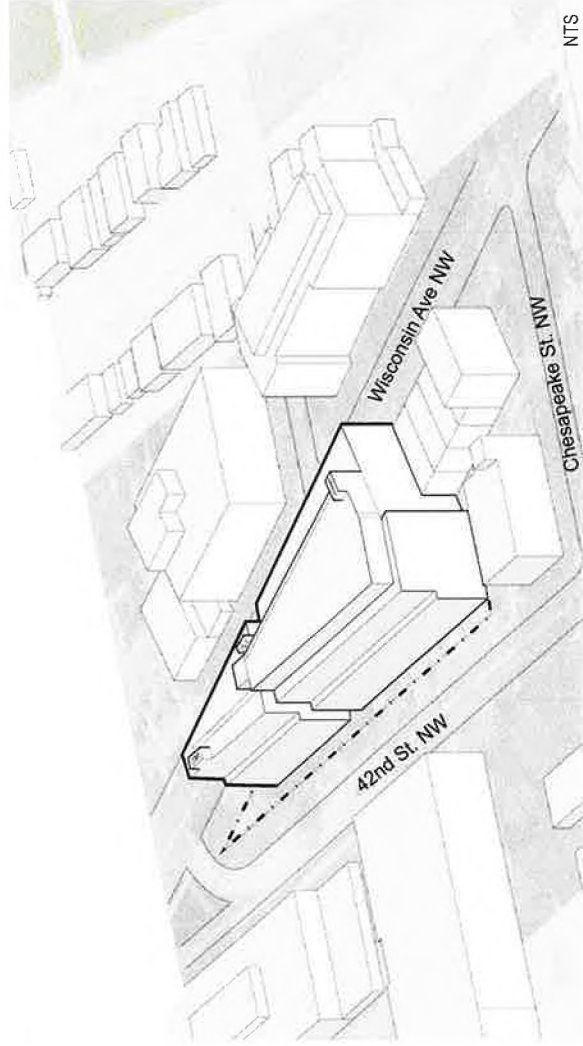
### Square 1733 MU-8A/WA Zone

Max. Building Height	75'
Max. Penthouse Height	20'
Max. FAR	5.4 (IZ+)
Max. Lot Occupancy	80% Residential
Max. Rear Yard Building Setbacks	12' setback when adjacent to R Zone
	6' setback at 45'



Pedestrian Corridor - 75% Uncovered

Section AA - NTS



### 4800 Wisconsin Ave, NW Zoning Diagram